

Natural Resource & Environmental Economics Working Group
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RE: 2008 draft Principles and Guidelines

Lacking the time to compose a thorough review of the draft P&Gs, I nonetheless wish to forward a few remarks about a single issue present in the current draft.

As currently composed, and in some contrast to the 1983 predecessor, the draft document does not invite planners to be visionary about the wealth of nonstructural alternative plans which are available to (especially) state and local authorities and governments. Indeed, portions of the draft attach unwarranted significance to existing policy, as if current policy constrains the formulation of alternative plans in some sort of practical way. As we move forward into a new era of resource and environmental scarcities, it will be important to acknowledge that many of the best solutions will involve changes in laws and policies at all governmental levels. If we are to avoid using federally funded structures as expensive band-aids for dated state/local policy, then more explicit attention to policy options is required. In this light, it is very troubling that the draft requests, to a large degree, plans that "are consistent with existing statutes, regulations and policies". Moreover, visioning "without plan conditions" as an extrapolation of current conditions establishes an analytical environment that is not robust in the visioning of new or revised policy, so this long-standing precept is due for an upgrade too.

Example policy options that we are well aware of occur in several areas addressable by federal projects. If local entities are mispricing either water or new connections to water utilities, why should those failures be permitted to artificially elevate the benefit measures for a federal project? [That is, repricing should be an explicitly modeled alternative even if it is not integrated with current local planning, and – going one step further – would local entities come to reprice in the absence of a project, making repricing embedded in "without plan conditions"?] If a State sponsors heightened water scarcity through water marketing constraints protective of certain interests or has failed to reserve sufficient instream flow waters, why is that grounds for a project funded by the nation's taxpayers? Benefit assessments should be performed against options that envision the relaxation of such legal impediments, or else we bind social progress unnecessarily and overspend public monies in the process. Similar statements apply for the other services generated by water agency projects. Notable among these are policies pertaining to growth, zoning, and self-insurance for flood-prone areas and the implications of these policies for

measuring flood control benefits. Also notable are the range of environmental stewardship programs which are implementable in lieu of a project that retunes the environment.

My recommendation is for a revised set of Principles and Guidelines that requires substantial attention to alternative and even novel policy options, at all governmental levels.

Sincerely,

A handwritten signature in black ink that reads "Ron Griffin". The signature is written in a cursive, flowing style.

Ronald C. Griffin

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